

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF GEORGIA
VALDOSTA DIVISION**

IN RE:	:	
	:	Chapter 11
PATRICK FARMS PARTNERSHIP,	:	
	:	Case No. 10-71203
Debtor.	:	
	:	

MOTION FOR EMERGENCY HEARING ON DEBTOR’S FIRST DAY MOTIONS

COMES NOW Patrick Farms Partnership (“Debtor”), as Debtor and Debtor-in-Possession in the above-captioned Chapter 11 case, by and through its counsel of record, and files this Motion for Emergency Hearing on Debtor’s First Day Motions and, in support thereof, respectfully shows this Court as follows:

1.

Contemporaneously herewith, the Debtor has filed or will file multiple first day motions, including:

- (i) Application for First Enlargement of Time to File Schedules, Statements, Lists and Initial Reports with the United States Trustee;
- (ii) Motion for Order Authorizing Payment of Wages, Salaries, and other Employee Benefits and Payment of Related Taxes and Withholdings;
- (iii) Application to Employ Attorneys;
- (iv) Application to Employ Restructuring Consultant; and
- (v) Motion to Establish Compensation Procedure for Professionals.

2.

The Debtor requests an emergency hearing on said First Day Motions. The Debtor shows that immediate and irreparable harm and economic and financial hardship will occur to its

business operations unless it is authorized to immediately grant or receive the relief requested in the First Day Motions; and be authorized to do all other things for which permission is sought in the First Day Motions.

3.

Along with this Motion for Emergency Hearing, Debtor's counsel submits its Certification Regarding Request for Emergency Hearing, attached hereto as Exhibit "A" and incorporated herein by this express reference thereto.

4.

The Debtor has submitted a proposed Order Authorizing Emergency Hearing with this Motion, and will serve such Order according to the terms therein.

Respectfully submitted, this 2nd day of August, 2010.

STONE & BAXTER, LLP
BY:

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